

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF IOWA**

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IN RE:

MERCY HOSPITAL, IOWA CITY,  
IOWA, et.al.,

Debtors.

CHAPTER 11

Case No. 23-00623  
(Jointly Administered)

**MOTION FOR LEAVE  
TO WITHDRAW AS  
COUNSEL FOR RMS  
HOLDINGS, P.C. AND  
RADIOLOGICAL MEDICAL  
SERVICES, P.C.**

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COMES NOW, Attorney Jennifer E. Lindberg and submits this Motion for Leave to Withdraw as counsel of record for RMS Holdings, P.C. and Radiological Medical Services, P.C., and states as follows:

1. Jennifer E. Lindberg filed an Appearance of Counsel for Interested Parties RMS Holdings, P.C. and Radiological Medical Services, P.C. on August 18, 2023.
2. RMS Holdings, P.C. and Radiological Medical Services, P.C. have informed the undersigned that her firm is no longer authorized to represent the clients. Per correspondence received this week, counsel's clients have requested this instant Motion for Leave to Withdraw be filed.
3. In light of this information, the undersigned provided the clients with a summary of upcoming deadlines in the litigation including the deadline to respond to the Liquidating Trustee's objection to claim on April 21, 2025 and recommended the clients hire new legal counsel.

4. The undersigned's clients have been contacted regarding, advised of, and served with a copy of this Motion for Leave to Withdraw pursuant to Local Rule 2091-1 and both clients consent to this Motion to Withdraw.
5. A copy of this Motion for Leave to Withdraw has also been served on all other parties whom service is required per Local Rule 2091-1 by filing the Motion for Leave to Withdraw through the Court's electronic filing system.

WHEREFORE, Jennifer E. Lindberg requests this Court enter an Order in this matter allowing her to withdraw as counsel of record for RMS Holdings, P.C. and Radiological Medical Services, P.C., and removing her from the Court's service list.

/s/ Jennifer E. Lindberg  
Jennifer E. Lindberg  
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AND RADIOLOGIC MEDICAL  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies under penalty of perjury, that a copy of this document was served on parties who receive electronic notice through CM/ECF as listed on CM/ECF's notice of electronic filing on the 11<sup>th</sup> day of April, 2025.

/s/ Jennifer E. Lindberg